

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**Conrado Cruz Perez, Gerardo Gregorio
Vega, Juan Francisco Monroy Poredes,
and Marco Gonzales,**

Plaintiffs

v.

Civil Action No.: 1:15cv415-HSO-JCG

**Oscar Gonzales, individually; Oscar
Gonzales d/b/a O.G. Construction a/k/a
O G Inc.; Ronald Perkins, individually; Ronald
Perkins d/b/a O.G. Construction a/k/a O G Inc.;
and Memorial Hospital at Gulfport**

Defendants

DEFENDANT'S PARTIAL MOTION TO DISMISS

Defendant Memorial Hospital at Gulfport, by and through its attorneys of record and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves this Court for an order of dismissal as to Plaintiffs' claims against it under the Trafficking Victims Protection Reauthorization Act of 2008 and Mississippi state law. In support of its Motion, Memorial states that Plaintiffs have failed to allege any facts showing that Memorial should be liable, all as more fully explained in Memorial's Memorandum in Support of this Motion.

THIS the 21st day of March, 2016.

Respectfully submitted,

s/Steven R. Cupp

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CERTIFICATE OF SERVICE

I certify that on this 21st day of March 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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